

EXHIBIT “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:13-cv-00721-FL**

MARIAN SNOW,

Plaintiff,

v.

**GLOBAL CREDIT AND COLLECTION
CORPORATION; and GLOBAL
INTERNATIONAL,**

Defendants.

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)
) **DECLARATION OF DEANNA L.
SGRO IN SUPPORT OF GLOBAL
INTERNATIONAL'S MOTION TO
DISMISS COMPLAINT**
)
)
)

COMES NOW, Deanna L. Sgro, pursuant to 28 U.S.C. § 1746, and declares under penalty of perjury as follows:

1. My name is Deanna L. Sgro. I am over the age of twenty-one (21) and am competent to testify to the matters contained herein. I have personal knowledge of all the facts set forth in this declaration.

2. I am General Counsel to Global Credit and Collection Corporation ("Global Credit") and Global International ("Global International"),¹ and am responsible for the coordination of the response of the Global Defendants to complaints that are filed in federal and state court against the Global Defendants throughout the United States.

3. Unlike Global Credit, Global International is not itself an operating entity in the United States, Canada, or elsewhere.

¹ At times, I will refer to Global International and Global Credit collectively as the "Global Defendants."

4. Instead, "Global International" is a non-registered d/b/a of Global Credit, used at times for marketing purposes abroad and primarily in connection with the Global Defendants' offices in Ontario, Canada, located at 1490 Denison St., Markham, Ontario L3R 9T7.

5. Global International does not conduct any business or commercial activities in North Carolina, does not have a license to do business in North Carolina, and does not have any offices or employees in North Carolina.

6. Global International does not possess any property, real or personal, located in North Carolina, does not maintain any accounts of any nature in North Carolina, and does not receive any revenue whatsoever from goods or services sold or performed in North Carolina.

7. Notably, Global International does not perform any debt collection activities in North Carolina and does not operate as a collection agency in North Carolina.

8. The Global Defendants have performed an internal investigation of Plaintiff's claims. Nevertheless, because Global International is not itself an operating entity and is, instead, a non-registered d/b/a of Global Credit, no records whatsoever of Plaintiff having an account with Global International could be found (or could even exist), nor are there (or could there ever be) any records that Global International attempted to collect a debt owed by Plaintiff or otherwise contacted or attempted to contact Plaintiff or any of the third-parties alleged in Plaintiff's Complaint.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 4, 2014.


DEANNA L. SGRO